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*Attorneys for Elbert R. Brown Trust, Viola Brown Trust,
Do Stay Inc., Elbert Brown, in his capacities as creator
and Trustee of the Elbert R. Brown Trust, and individually
as beneficiary of the Elbert R. Brown Trust, and Viola Brown,
in her capacities as creator and Trustee of the Viola Brown
Trust, and individually as beneficiary of the Viola Brown Trust.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ELBERT R. BROWN TRUST, VIOLA BROWN
TRUST, DO STAY INC., ELBERT BROWN, in
his capacities as CREATOR and TRUSTEE of
the ELBERT R. BROWN TRUST, and

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05398 (BRL)

INDIVIDUALLY as BENEFICIARY of the
ELBERT R. BROWN TRUST; and VIOLA
BROWN, in her capacities as CREATOR and
TRUSTEE of the VIOLA BROWN TRUST, and
INDIVIDUALLY as BENEFICIARY of the
VIOLA BROWN TRUST,

Defendants.

**DEFENDANTS' MOTION TO DISMISS THE TRUSTEE'S
"OBLIGATIONS" AND SUBSEQUENT TRANSFEREE CLAIMS**

Defendants Elbert R. Brown Trust, Viola Brown Trust, Elbert Brown, Viola Brown and
Do Stay, Inc., by their attorneys, and pursuant to Federal Rule of Bankruptcy Procedure 7012(b)
and Federal Rule of Civil Procedure 12(b)(6), hereby move to dismiss the Trustee's
"Obligations" and subsequent transferee claims because the Trustee's allegations are not
sufficiently pled.

Dated: New York, NY
July 24, 2015

SEEGER WEISS LLP

By: s/ Parvin K. Aminolroaya
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Attorneys for Elbert R. Brown Trust, Viola Brown Trust, Do Stay Inc., Elbert Brown, in his capacities as creator and Trustee of the Elbert R. Brown Trust, and individually as beneficiary of the Elbert R. Brown Trust, and Viola Brown, in her capacities as creator and Trustee of the Viola Brown Trust, and individually as beneficiary of the Viola Brown Trust.

CERTIFICATE OF SERVICE

I, Parvin K. Aminolroaya, hereby certify that on July 24, 2015, I caused a true and correct copy of the foregoing document to be filed electronically with the Bankruptcy Court and served upon counsel for parties to this action who receive electronic service through CM/ECF.

s/ Parvin K. Aminolroaya